



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER RESOURCES  
WILLIAM R. SNODGRASS TENNESSE TOWER  
312 ROSA L. PARKS AVENUE  
NASHVILLE, TN 37243-1534

August 7, 2013

Mr. Andy Holt - Owner  
A & E Livestock  
461 Jewell Store Road  
Dresden, TN 38225

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**RECEIPT # 7005 1820 0001 5799 6741**

RE: Primary Waste Holding Lagoon

Mr.Holt:

Thank you for your phone call of Tuesday, August 6, 2013, informing the Jackson Environmental Field Office staff of an imminent overflow from the primary waste lagoon at your concentrated animal feeding operation located on Woodruff Road in Weakley County. Based on the information you provided to this office, pumping from wastewater treatment lagoon may be immediately necessary to protect the integrity of your system, avoid potential safety concerns, and prevent an uncontrolled discharge of wastewater. **This letter does not authorize a discharge to waters of the state.** Please be advised that a discharge from this facility cannot be authorized by this office except under the requirements of an appropriate permit. Further, if a discharge to waters of the state occurs, you are required by state and federal law to apply for an individual NPDES permit and you may be subject to enforcement. In this one instance, if pumping is necessary, you should observe the following requirements:

1. The lagoon may be pumped down to a level that will accommodate a 25 year/24 hour storm event plus one foot of freeboard.
2. A record of the volume of wastewater pumped from the lagoon should be maintained. This record should include the total number of gallons pumped and the number of hours of wastewater pumping, on a daily basis.
3. The wastewater pumped from the lagoon should be land applied within acceptable agronomic standards and in such a fashion so as to prevent discharge to waters of the state. If a discharge to waters of the state occurs, a record of the number of gallons and duration of that discharge should be maintained. A sample of that discharge should be obtained and analyzed according to the table below.
4. This pumping operation must be completed within 10 days of receipt of this letter.

| EFFLUENT<br>CHARACTERISTIC      | MEASUREMENT<br>FREQUENCY | SAMPLE<br>TYPE |
|---------------------------------|--------------------------|----------------|
| FLOW*                           | 1/Discharge              | Estimate       |
| pH**                            | 1/Discharge              | Grab           |
| BOD5                            | 1/Discharge              | Grab           |
| TOTAL SUSPENDED SOLIDS<br>(TSS) | 1/Discharge              | Grab           |
| TKN                             | 1/Discharge              | Grab           |
| NITROGEN, TOTAL                 | 1/Discharge              | Grab           |
| NITROGEN, AMMONIA TOTAL         | 1/Discharge              | Grab           |
| PHOSPHORUS, TOTAL               | 1/Discharge              | Grab           |
| E. COLI                         | 1/Discharge              | Grab           |

\* Flow shall be reported in Million Gallons per Day (MGD)

\*\* pH analysis shall be performed within fifteen (15) minutes of sample collection

Please submit these records, along with any sampling results, to the Manager of Water Resources at 1625 Hollywood Drive, Jackson, Tennessee 38305.

Thank you again for your phone call concerning this situation. The Division would like to continue open communication efforts with you in order to resolve any other questions and/or concerns that you might have. If you require additional information, please do not hesitate to contact the staff of the Jackson Environmental Field Office.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sandra Dudley", followed by the text "for Sandra Dudley" in a similar script.

Sandra Dudley, P.E., PhD  
Director

SKD:MAJ

cc: CO-Compliance and Enforcement  
JEFO-DWR  
OGC